

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA,

CASE NO.: 3:21-CV-016

Plaintiff,

JUDGE

vs.

**1) Thirty-Three Thousand Twenty
and 00/100 Dollars (\$33,020.00) in
United States Currency,**

**ANSWER TO PLAINTIFF'S
COMPLAINT FOR FORFEITURE
IN REM**

and

**2) One 2013 Chrysler 300,
VIN: 2C3CCAAGXDH589019, with
All attachments thereon,**

Defendants.

Now comes the Claimant, **ANTHONY HART**, by and through his attorneys, **RION, RION AND RION, L.P.A., INC.**, and hereby respectfully submits to this Honorable Court their Answer to Plaintiff's Complaint for Forfeiture in REM.

1. Claimant admits the allegations as set forth in paragraphs 1, 2, 3, 4, 5, 6, 25, and 27 in the Verified Complaint for Forfeiture in REM.

2. Claimant denies the allegations as set forth in paragraphs 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 26, and 28.

WHEREFORE, Claimant demands the Verified Complaint for Forfeiture in REM be dismissed with costs assessed to the Government and for attorney's fees.

Claimant further requests an order of this Court demanding the return of said properties and not subject to any expenses associated with the illegal taking of these properties.

Respectfully submitted,

/s/ Jon Paul Rion

JON PAUL RION (#0067020)
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the Office of the U.S. Attorney, via the Court's electronic filing system.

/s/ Jon Paul Rion

JON PAUL RION (#0067020)
RION, RION AND RION, L.P.A., INC.